

REMARKS

Claims 1-6, 8-16, 18, and 20-23 are currently pending in the patent application. The Examiner has rejected Claim 14 under 35 USC 112 as indefinite. Applicants thank the Examiner for pointing out the dependency problem. Applicants have amended Claim 14 to appropriately depend from Claim 12 and have included amendment language which finds support in the original Specification at Page 7, lines 15, et seq. The Examiner has newly rejected Claims 1-4, 6, 8-13, 15-16, 18, and 20-23 under 35 USC 103 as being unpatentable over the Yu patent in view of the Tuli patent; and, has rejected Claims 5 and 14 under 35 USC 103(a) as being unpatentable over Yu in view of Tuli and further in view of Shteyn. Applicants submit, herein, amendments to the language of independent Claims 1, 9 and 22. The amendment language finds support in the original Specification (for example, on page 5, lines 13-21). For the reasons set forth below, Applicants believe that the amended claims are patentable over the cited art.

The present invention addresses the problem of communicating service information, and more specifically, map service information, from a server to a user device having limited capability to display and interact with the

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information. Under the present invention, user input commands are sent to a command processing means which is independent of the user device and of the server having the map service information. The command processing means interprets the user input and sends the interpreted user input to the map service server. Upon receipt of the interpreted user input commands, the map service server obtains service mapping parameters correlated to the interpreted user input commands, modifies the map service information based on the service mapping parameters, and sends the modified map service information to the user device. The user device can then display and interact with the received service map information, since the received service map information has been correlated to the input capabilities of the user device (see: the Specification at page 6, lines 15-22, etc.). The command processing means and the server may access user data at a database, which user data may include service mapping parameters, a user identifier, and type of user device. In addition, the user data may be modified by either the server or the user device. Applicants believe that the invention as claimed is neither taught nor suggested by the cited art.

The Yu patent is directed to a method and apparatus for displaying images on mobile devices wherein the user device

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sends its request for resource information to a link server (300 of Fig. 3). At the link server, user access and device parameter information is stored based on a subscription (Col. 6, lines 30-58). The link server sends the user request to the service/resource server. Once the link server obtains the requested resource information from the service/resource server, it preprocesses the retrieved resource information for the subscribing user using the stored device parameters (see: Col. 7, lines 11-20). As is expressly taught in Col. 8, lines 12-14, "[i]t must be pointed out, the received image...is not the image originating from the resource". Accordingly, the link server of Yu retrieves information from a resource server based on the user request and then preprocesses (e.g., performs protocol conversion on) the information for delivery to the user. Yu does not teach or suggest that the internet source of the image information modifies the stored image information for the user device. Rather, the link server performs that function.

The Examiner has cited the Tuli patent as providing the teachings which are missing from the Yu patent. The Tuli patent is directed to a portable device which allows a user to access the Internet through a cellular telephone. Under Tuli, the portable device comprises a modem that connects to

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a cellular phone to obtain a wireless connection to the Internet. Once the connection is established, a user at the portable device can click on text or images (Col. 1, lines 41-43) that represent links to Web pages. The Web server program at the host computer retrieves the requested information and provides the retrieved information to a Browser Translator, which "translates the information into a black and white bit map or raster image" (Col. 1, lines 35-36 and Col. 2, lines 24-30). Under one embodiment of Tuli, the bit map or image is then divided into sections, and compresses and transmits only one section at a time to the portable device (Col. 2, lines 39-44). In another embodiment of Tuli, the "display of the palm top device mirrors the entire virtual browser window...[whereby the] user views a bit map or raster image that represents the entire window" (Col. 4, lines 53-55).

Tuli states that the Browser Translator performs the "translation" of retrieved information into bit map or raster images. Tuli does not, however, teach or suggest that the Web server or the Browser Translator performs the translation based on received user input. Tuli performs the translation and compression without actual knowledge of the capabilities of the portable device, since there is no teaching of a user providing capability information or of

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the server obtaining that information. Moreover, Tuli does not provide any teachings about correlating service mapping parameters for modifying retrieved information based on user input commands. Tuli simply provides a preset translation of web information in a preset format.

Applicants contend that Tuli does not provide the teachings which are missing from the Yu patent. Neither Yu nor Tuli teaches that an internet source of retrieved information customizes the information for display at a particular user device based on interpreted user input received in the request from the user device. The presently pending claims expressly teach that the server obtains service mapping parameters correlated to the input capabilities of the user based on the interpreted user input and then modifies the map service information based on the service mapping parameters prior to sending the modified map service information from the server to the user device.

Applicants first contend that one having skill in the art would not be motivated by the teachings of Yu or Tuli to modify Yu with the Tuli patent teachings. Yu expressly teaches a solution comprising an intermediate service so that neither the existing internet servers nor the existing portable devices need to be modified. To suggest modifying the internet servers with the Tuli patent teachings

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contradicts the premise of the Yu solution. Moreover, even if one were motivated to modify Yu with Tuli, one would not arrive at the invention as claimed. The combined system would have a Tuli internet server that would provide bit maps to the Yu intermediate service. The internet server would still not be obtaining service mapping parameters based on interpreted user input and would still not be applying those parameters to modify map service information to be provided from the server to the user device. Clearly, therefore, the claimed invention would not be rendered obvious by any modification of Yu with Tuli.

Further with regard to the obviousness rejections of Claims 5 and 14, Applicants rely on the discussion of the Yu and Tuli patents presented above, and respectfully assert that the Shteyn patent does not provide those teachings which are missing from the Yu patent. Shteyn is cited for disclosing that a user can initiate a change in preferences or profiles that are stored in a remote database. Modifying Yu and Tuli so that a user can change subscription information stored at the server would not result in the invention as claimed, since none of the cited references teaches or suggests the claimed steps and means for the server to dynamically modify map service information us service mapping parameters correlated for the input

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capabilities of the user device. Accordingly, Applicants conclude that the invention is not obviated by the cited art.

For a determination of obviousness, the prior art must teach or suggest all of the claim limitations. "All words in a claim must be considered in judging the patentability of that claim against the prior art" (In re Wilson, 424 F. 2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). If the cited references fail to teach each and every one of the claim limitations, a *prima facie* case of obviousness has not been established by the Examiner. Applicants respectfully conclude that obviousness has not been established by the Examiner.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,
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